

Date:

1.6.2018

RE:

Annual 47 C.F.R. S: 64 2009(e) CPNI Certification

EB Docket No. 06-36

Name of Company covered by this certification: West Central Ohio Internet Link, LLC

Form 499 Filer ID:

826863

Name of Signatory:

Michael J. O'Connor

Title of Signatory:

President

I, Michael J. O'Connor certify that I am an officer of the company named above, and acting as the agent of the company, that I have personal knowledge that the company has established operating procedures that are sufficient and adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. S:64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI

Much 0 6 Date: 1-4-16

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**FCC** 





Date:

1.6.2018

To:

Commissions Secretary, Office of the Secretary

Federal Communications Commission

9300 East Hampton Drive Capitol Heights, MD 20743

Re:

47 C.F.R. 64.2009(e) Certification and Compliance

## To Whom It May Concern:

Attached please find a copy of our CPNI communication sent to every VOIP/broadband customers A long with our privacy notice which is also posted on our web site.

A few limited and trained employees have access to records and as a small company we do not work with any outside marketing agencies and do not do internal marketing utilizing CPNI from our customers. Social Security numbers are not maintained of office systems and EIN's are not matched with CPNI data from our customer service data base.

As President of West Central Ohio Internet Link, LLC, I am also Director of Network Operations. I have, in place, excellent secured operations that limits the ability to match data with customers and each of my network employees know the CPNI laws and sign confidentiality paperwork to assure compliance. Thank you,

Michael J. O'Connor President WCOIL, LLC

419.229.2645 X 1010

mike@wcoil.com

cc: file



January 8, 2018

## Annual Privacy Notice to West Central Ohio Internet Link Customers

### **Customer Proprietary Network Information**

**CPNI** Use of Account Information for WCOIL Customers

In July 2017, the FCC reinstated the CPNI rules governing the privacy obligations of Voice Service providers under section 222. By law West Central Ohio Internet Link DBA WCOIL, is required to keep your Customer Proprietary Network Information confidential and protecting your right is a duty that WCOIL takes very seriously. Data collected during our normal operations of telephone service may include the type, configuration and amount of services you use, as well as destination data and quantity of individual services you utilize.

WCOIL will not disclose or sell Customer Proprietary Network Information to third party affiliations regardless of the service type you have with WCOIL. WCOIL will, in Order to service your account better and more efficiently, share within the WCOIL Company, your CPNI only as it relates to providing you other services WCOIL offers that you may need or desire.

WCOIL will use internally only, your CPNI information to better service your account better as it relates to trouble shooting your problems, enhancing your services, or diminishing your costs. You may decline that approval, however, this may prevent WCOIL from technical supporting your account or internally analyzing our costs and abilities to better service your account in the future.

If you wish WCOIL to not share your personal information within our organization for the sole use of trouble shooting any concerns you have, enhancing your service or diminishing your costs, you may contact WCOIL. This will however, greatly reduce our ability to trouble shoot for you in an efficient manner or possibly eliminate our ability to assist you with trouble shooting concerns. For hearing impaired, please send a certified letter to WCOIL, attention Barb O'Connor or drop off a letter of requests to 215 N. Elizabeth St., Lima, OH 45801 Attention Barb O'Connor.

You may at anytime alter your CPNI approval within the WCOIL Company by revoking your requests. One months notice is required from the date of this letter for declining of CPNI information internally within WCOIL.

#### **Do-Not-Call-Solicitor Notification**

The Federal Communications Commission and the Federal Trade Commission have established a Do Not Call Registry. Do Not Call pertains to telemarketing only. WCOIL is required by the FCC to communicate to our customers using our telephone services that if your company uses telecommunications, you are required to abide by the Do Not Call rules and regulations. Please familiarize yourself with the regulations at <a href="https://www.donotcall.gov">www.donotcall.gov</a> and consult with qualified personnel by going to the FCC and FTC rules governing telemarketing and telephone solicitation at 47 CFR 64.1200 and 16 CFR. Part 310.

WCOIL does reserve the right to use all telecommunications methods including cell phones as well as email addresses to contact customers concerning account services and collections.

Thank you for allowing WCOIL to service your telephone communications.



# Privacy Policy

WCOIL collects personal and contact information from all customers in order to better service their needs with accurate billing, technical support responses and increasing services. All general information collected from our customers is with the customer's knowledge and is requested via a live person. Additional data information collected may include amount of bandwidth used and or other network related information as well as telephone numbers for inbound and outbound calling and services used for VOIP customers. WCOIL may use, disclose, or permit access to your customer information in these circumstances only (1) as required by law (2) with your approval and (3) in providing the service from which the customer information is derived. WCOIL does not share identifying information (name, address, phone numbers or any other data collected) with other customers for any reason without written consent (Opt In) from the original customer that they are issuing consent in accordance with FCC Rule 47 C.F.R. S: 64.2009(e). In instances of joint services, WCOIL will provide demographic and general information on customers without detail. WCOIL customers will receive notifications via email of new services, service changes, or planned outages not considered SPAM.

#### **WCOIL Affiliates**

WCOIL does work with affiliate companies to provide services such as Phone, Wireless, Fiber, Cable, DSL and Security for networking connections. All affiliates are provided with identifying account numbers for service purposes and address information if connectivity requires it. No personal information including billing information is disclosed.

## WCOIL User and Client Web Pages

WCOIL offers free web space for client and user pages which reside on WCOIL's servers. WCOIL reserves the right to pull down any web site which is deemed unlawful, distasteful, or unethical. WCOIL reserves the right to refuse service to house professional web pages based on content.

#### WCOIL Customers

WCOIL reserves the right to not service customers who have demonstrated a past history of unlawful practices on the internet or breaking of WCOIL policies. WCOIL also reserves the right to correspond with local law enforcement agencies in the event WCOIL identifies unlawful actions being taken both proactively and retroactively. WCOIL also reserves the right to refuse service to customers demonstrating a past history of payment practices personally and family members who reside at the same address.

## **Public Forums**

All information that is disclosed on user and client personal web space is the sole responsibility of the user or client. WCOIL is not responsible for our user's or clients views or disclosures. It is advised to use caution in divulging personal information for public viewing.





# **Data Security**

WCOIL has security measures in place to protect the loss, misuse, and alteration of the information under our control. While we make every effort to ensure the integrity and security of our network and systems, we cannot 100% guarantee that security measures are not prone to hacking attempts.

#### MY WCOIL

WCOIL offers Members the opportunity to access or modify information provided during registration. To access or modify such information, visit MY WCOIL on the WCOIL web site or call our office to protect your personal information on your account.

Rev 12.1.2017